

## MEMO ENDORSED

**ACKnowledge IP P.C.**

*Intellectual Property Law & Consulting*

ACKnowledge IP P.C.  
6800 Jericho Tpke  
Suite 120W  
Syosset, NY 11791  
631.970.7060  
ACKnowledgeIP.com


November 29, 2023

Paul D. Ackerman  
+1.516.376.4046 (Mobile)  
paul@acknowledgeIP.com

**VIA ECF**

Hon. Edgardo Ramos  
United States District Judge  
Southern District of New York  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, NY 10007

The request is granted. The parties shall submit the proposed protective order by December 8, 2023. SO ORDERED.

  
Edgardo Ramos, U.S.D.J.  
Dated: December 1, 2023  
New York, New York

**Re: Dumbo Moving & Storage, Inc. v. Piece of Cake Moving & Storage LLC et al., Case No. 22-CV-05138 (ER)**

Dear Judge Ramos:

The Discovery Plan and Scheduling Order (ECF No. 80) "Scheduling Order" in the above-captioned action requires the parties to jointly submit a proposed protective order and ESI discovery protocol to the Court on November 20, 2023, which was extended by the Court to November 29, 2023.

The parties are filing today a stipulated ESI protocol for the Court's approval.

With respect to the protective order, the parties are continuing to confer on specific provisions regarding the protection of source code and request that the deadline to submit the protective order for the Court's consideration be extended to December 8, 2023. This will allow the parties to either reach agreement or narrow the disputed issues for the Court's determination. This is the second request to extend this deadline.

Thank you for the Court's consideration in this matter.

Respectfully submitted,

*/Paul D. Ackerman/*

Paul D. Ackerman

cc: All counsel (via ECF)